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9 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, ) 2:17-CR-062-JCM-NJK  
11 Plaintiff, )  
12 v. ) **Stipulation for Entry of Order of**  
13 PAUL HWAN JIN, et al., ) **Forfeiture as to Ji Jin as a Third Party**  
14 Defendant. ) **Petitioner and Order**

15 The United States of America and Ji Jin agree as follows:

16 1. The Grand Jury sitting in Las Vegas, Nevada returned a 25-Count  
17 Superseding Criminal Indictment against Paul Hwan Jin for violations of 18 U.S.C. §  
18 1029(a)(2) and (b)(2); 18 U.S.C. § 1956(h); and 18 U.S.C. § 1957. Superseding Criminal  
19 Indictment, ECF No. 23.

20 2. Paul Hwan Jin pled guilty to Count 1 of a 25-Count Superseding Criminal  
21 Indictment charging him with conspiracy to commit access device fraud in violation of 18  
22 U.S.C. § 1029(a)(2) and (b)(2) and agreed to the forfeiture of property set forth in the Plea  
23 Agreement, the Amended Bill of Particulars, and Forfeiture Allegation One of the  
24 Superseding Criminal Indictment. Superseding Criminal Indictment, ECF No. 23;  
25 Amended Bill of Particulars, ECF No. 78.

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1           3.     Ji Jin knowingly and voluntarily agrees to the abandonment, the civil  
2 administrative forfeiture, the civil judicial forfeiture, or the criminal forfeiture of the  
3 following property:

4                   1.     \$67,190.86; and

5                   2.     \$7,492.88

6 (all of which constitutes property).

7           4.     Ji Jin knowingly and voluntarily agrees to abandon or to forfeit the property  
8 to the United States.

9           5.     Ji Jin knowingly and voluntarily agrees to relinquish all possessory rights,  
10 ownership rights, and all rights, titles, and interests in the property.

11          6.     Ji Jin knowingly and voluntarily agrees to waive her right to any  
12 abandonment proceedings, any civil administrative forfeiture proceedings, any civil judicial  
13 forfeiture proceedings, or any criminal forfeiture proceedings (all of which constitutes  
14 proceedings) of the property.

15          7.     Ji Jin knowingly and voluntarily agrees to waive service of process of any and  
16 all documents filed in this action or any proceedings concerning the property.

17          8.     Ji Jin knowingly and voluntarily agrees to waive any further notice to her, her  
18 agents, or her attorneys regarding the forfeiture and disposition of the property.

19          9.     Ji Jin knowingly and voluntarily agrees not to file any claim, answer, petition,  
20 or other documents in any proceedings concerning the property.

21          10.    Ji Jin knowingly and voluntarily agrees to withdraw any claims, answers,  
22 counterclaims, petitions, or other documents she filed in any proceedings concerning the  
23 property.

24          11.    Ji Jin knowingly and voluntarily agrees to waive the statute of limitations, the  
25 CAFRA requirements, Fed. R. Crim. P. 7, 11, and 32.2, the constitutional requirements,  
26 and the constitutional due process requirements of any abandonment proceedings or any  
27 forfeiture proceedings concerning the property.

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1           12.     Ji Jin knowingly and voluntarily agrees to waive her right to a hearing on the  
2 forfeiture of the property.

3           13.     Ji Jin knowingly and voluntarily agrees to waive all constitutional, legal, and  
4 equitable defenses and claims to the forfeiture of the property and the in personam criminal  
5 forfeiture money judgment in any proceedings, including but not limited to, (a) any  
6 constitutional or statutory double jeopardy defenses and claims, (b) any defenses and claims  
7 under the Eighth Amendment to the United States Constitution, including, but not limited  
8 to, any defenses and claims of excessive fines or cruel and unusual punishments, and (c) any  
9 constitutional defenses and claims under *Honeycutt v. United States*, 137 S. Ct. 1626 (2017).

10          14.     Ji Jin knowingly and voluntarily agrees to the entry of an Order of Forfeiture  
11 of the property to the United States.

12          15.     Ji Jin waives the right to appeal any Order of Forfeiture.

13          16.     Ji Jin understands that the forfeiture of the property shall not be treated as  
14 satisfaction of any assessment, restitution, fine, cost of imprisonment or any other penalty  
15 that may be imposed in addition to forfeiture.

16          17.     Ji Jin knowingly and voluntarily agrees to the conditions set forth in this  
17 Stipulation for Entry of Order of Forfeiture as to Ji Jin and Order (Stipulation).

18          18.     Ji Jin knowingly and voluntarily agrees to hold harmless the United States,  
19 the United States Department of Justice, the United States Attorney's Office for the District  
20 of Nevada, the United States Department of the Treasury, the United States Internal  
21 Revenue Service, the Las Vegas Metropolitan Police Department, their agencies, their  
22 agents, and their employees from any claim made by her or any third party arising from the  
23 facts and circumstances of this case.

24          19.     Ji Jin knowingly and voluntarily releases and forever discharges the United  
25 States, the United States Department of Justice, the United States Attorney's Office for the  
26 District of Nevada, the United States Department of the Treasury, the United States  
27 Internal Revenue Service, the Las Vegas Metropolitan Police Department, their agencies,  
28 their agents, and their employees from any and all claims, rights, or causes of action of any



1 kind that Ji Jin now has or may hereafter have on account of, or in any way growing out of,  
2 the seizures and the forfeitures of the property in the abandonment, the civil administrative  
3 forfeitures, the civil judicial forfeitures, and the criminal forfeitures.

4 20. Each party acknowledges and warrants that its execution of the Stipulation is  
5 free and is voluntary.

6 21. The Stipulation contains the entire agreement between the parties.

7 22. Except as expressly stated in the Stipulation, no party, officer, agent,  
8 employee, representative, or attorney has made any statement or representation to any other  
9 party, person, or entity regarding any fact relied upon in entering into the Stipulation, and  
10 no party, officer, agent, employee, representative, or attorney relies on such statement or  
11 representation in executing the Stipulation.

12 23. The persons signing the Stipulation warrant and represent that they have full  
13 authority to execute the Stipulation and to bind the persons and/or entities, on whose behalf  
14 they are signing, to the terms of the Stipulation.

15 24. This Stipulation shall be construed and interpreted according to federal  
16 forfeiture law and federal common law. The jurisdiction and the venue for any dispute  
17 related to, and/or arising from, this Stipulation is the unofficial Southern Division of the  
18 United States District Court for the District of Nevada, located in Las Vegas, Nevada.

19 25. Each party shall bear her or its own attorneys' fees, expenses, interest, and  
20 costs.

21 26. Nothing in this agreement shall impair Ji Jin from litigating her interest in  
22 CBLV, LLC d/b/a Chloe Beauty, under 21 U.S.C. § 853(n) in this case.

23 27. This Stipulation shall not be construed more strictly against one party than  
24 against the other merely by virtue of the fact that it may have been prepared primarily by  
25 counsel for one of the parties; it being recognized that both parties have contributed  
26 substantially and materially to the preparation of this Stipulation.

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2 IT IS HEREBY CERTIFIED, pursuant to 28 U.S.C. § 2465(a)(2), that there was  
3 reasonable cause for the seizure and forfeiture of the property.  
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5 DATED: 03/25/2020

DATED: 07/09/2021

6 CHRISTOPHER CHIOU  
7 Acting United States Attorney

8  
9 Ji Jin

  
/s/ Peter S. Levitt

PETER S. LEVITT  
Assistant United States Attorney

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12 IT IS SO ORDERED:

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16 UNITED STATES DISTRICT JUDGE

17 DATED: July 14, 2021  
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